

**Bellcore**

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May 19, 1997

Ex Parte

Mr. William F. Caton  
Acting Secretary  
Federal Communications Commission  
1919 M Street, NW, Room 222  
Washington, DC 20554

RE: CC Docket 96-254

Dear Mr. Caton:

Today, Mike Slomin, Art Reilly, Jim Staats and the undersigned representing Bellcore met with Greg Cooke, Matt Nagler, Les Selzer and Bill Howden from the Common Carrier Bureau's Network Services Division to discuss Bellcore's generic requirements process. Attached is a copy of the material used during our meeting.

In accordance with Section 1.1206 of the Commission's rules, an original and one copy of this letter is being filed with your office. If there are any questions relating to this filing please call the undersigned.

Sincerely,



**RECEIVED**

**MAY 20 1997**

Federal Communications Commission  
Office of Secretary

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**Attachment**

**cc: Greg Cooke  
Matt Nagler  
Les Selzer  
Bill Howden**

# **BELLCORE'S PROPOSED GENERIC REQUIREMENTS**

**Arthur K. Reilly**

# ***Standards and Generic Requirements***

## ***Business and Regulatory Drivers***

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**Generally Recognized Public Network Needs include:**

- Interoperability**
- Network Integrity**

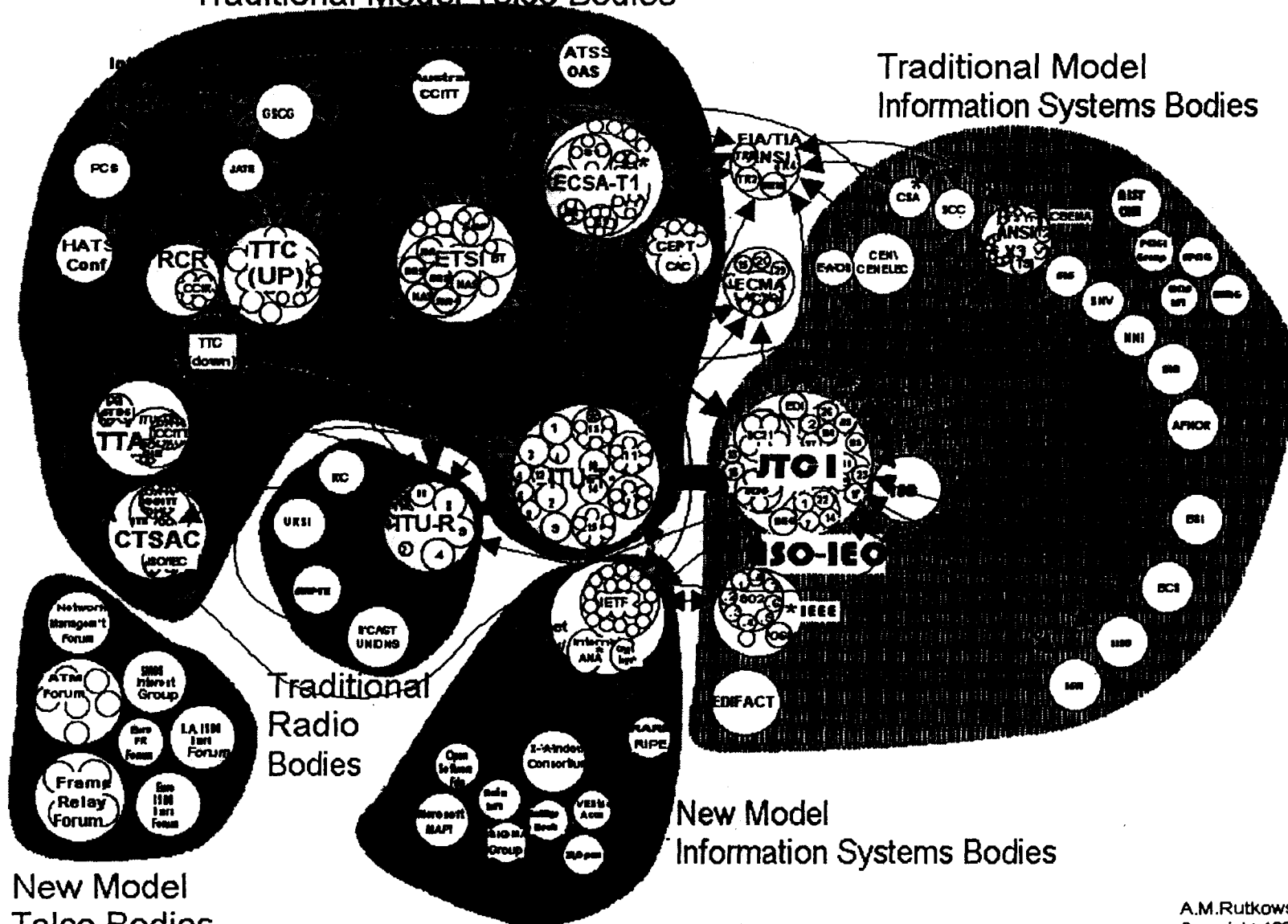
**Telecommunication Reform including  
Interconnection and Unbundling Further  
Stimulate and Challenge these Needs**

**A Level Playing Field Avoids Single Vendor  
Dominance and Promotes Competition in  
Meeting these Needs**

# The Standards Making Universe

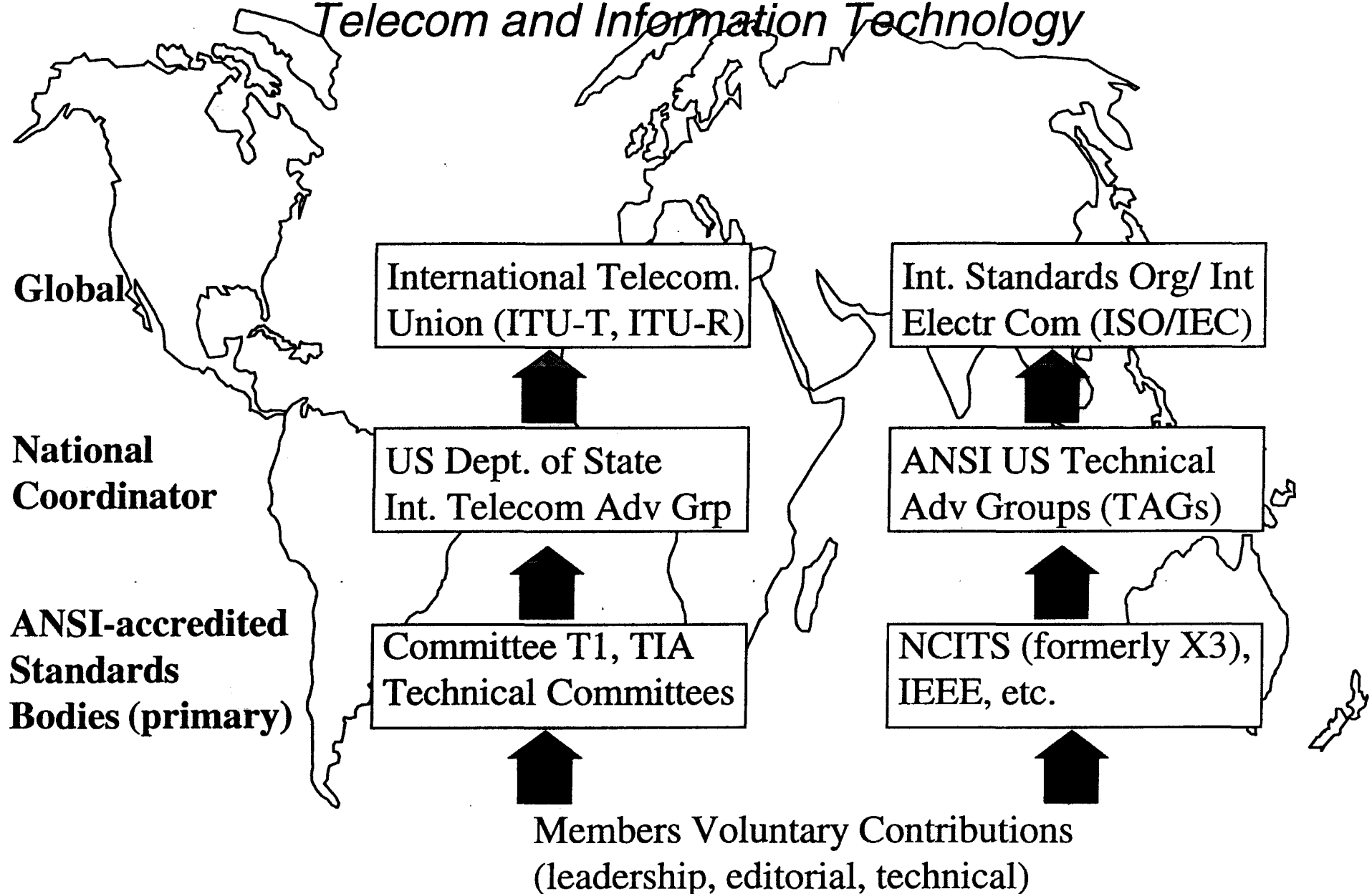
## Traditional Model Telco Bodies

## Traditional Model Information Systems Bodies



# Accredited Standards

## *Telecom and Information Technology*



# ***PROPOSED GENERIC REQUIREMENTS***

## ***Standards - GR Comparisons***

### **Standards**

**membership open to all**  
**due process**  
**published \***  
**used voluntarily**  
**promotes innovation**  
**stimulates competition**  
**facilitates trade**

### **Bellcore GRs**

**funding open to all**  
**due process**  
**published \***  
**used voluntarily**  
**promotes innovation**  
**stimulates competition**  
**facilitates trade**

**\* Proprietary information may be subject  
to Non-disclosure Agreements**

# ***PROPOSED GENERIC REQUIREMENTS***

## ***Standards - GR Comparisons (continued)***

### **Standards**

**members contribute  
resources (significant  
industry costs - worktime  
meeting time, travel, etc.)**

**members set target  
objectives for outputs**

### **Bellcore GRs**

**Bellcore provides personnel,  
leadership, editorial  
and technical resources  
(clients pay Bellcore)**

**Bellcore contracts with  
clients to satisfy  
deliverable deadlines**



# ***PROPOSED GENERIC REQUIREMENTS***

## ***Standards - GR Comparisons (continued)***

### **Standards**

**final content depends upon consensus agreement on technical contributions submitted; may have gaps or options; may be too forward-looking for near-term implementation**

**stable text available  
12 - 24 months**

### **Bellcore GRs**

**Bellcore provides timely, high-quality implementable solutions for client comment /agreement (escalation within Bellcore, majority vote, ADR)**

**completed GR available to client in 3 - 12 months;  
Bellcore GRs have sometimes been developed before standards (e.g. *Bellcore* SONET, AIN, LNP)**

# ***PROPOSED GENERIC REQUIREMENTS***

## ***Standards - GR Comparisons (continued)***

### **Standards**

**published 6 -9 months  
after stable text is  
approved**

### **Bellcore GRs**

**published within 3-4 months  
of GR completion**

# ***PROPOSED GENERIC REQUIREMENTS***

## ***Example Contributions to Standardized Technology***

- **SONET**
- **National ISDN**
- **Advanced Intelligent Network**
- **Common Channel Signaling**
- **Personal Communications Services (i.e. PACS)**
- **Asymmetrical Digital Subscriber Line (ADSL)**

## ***Bellcore's Proposed Generic Requirements Industry Recognition***

**The 1995-96 Network Reliability Council (NRC) charter included an investigation of the “adequacy of the Standards Development” process. One of their key conclusions was that:**

- “The voluntary, open, consensus-based standards process, including Industry Forums and Generic Requirements Process, is viewed as being adequate to support network interoperability and reliability issues relating to basic voice services on wireline networks”.**

## ***Bellcore's Proposed Generic Requirements Industry Recognition (cont'd)***

- **An NRC survey found that Bellcore proposed Generic Requirements were the most widely-used reference on network reliability and integrity**
- **In a speech at the NRC ComForum, FCC Chairman Reed Hundt indicated that interoperability is the foundation of competition, and expressed appreciation to Bellcore for its leadership in this critically important area**

# ***Bellcore's Proposed Generic Requirements***

## ***Bellcore's Commitment***

**Bellcore Proposed Generic Requirements have been used extensively within the industry**

**The need for and importance of timely and high-quality Equipment and Interface Requirements within the industry are expected to continue if not increase:**

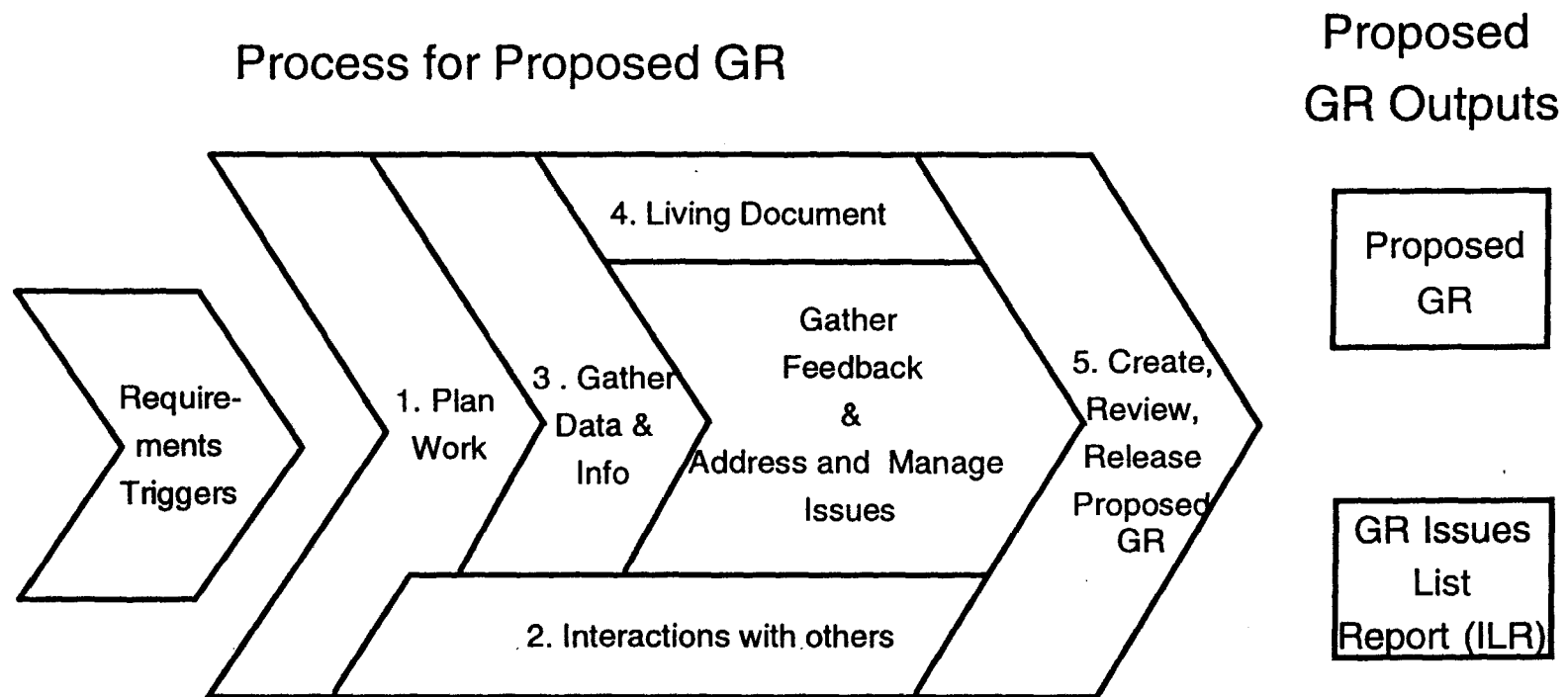
- Rapid industry growth,**
- New technologies/services,**
- Telecom Reform, and**
- Increased competition**

***Bellcore is committed to being the industry's first choice for innovation and comprehensive networking solutions.***

## ***Standards-Setting Entities - Process Outlined in TA96***

- **Public announcement that work is being considered**
- **Invitation to all interested parties to fund and participate; administered on reasonable and non-discriminatory basis**
- **Seek agreement of all funders on dispute resolution process; Default, if all funders do not agree, is FCC Alternate Dispute Resolution (ADR) process**
- **Draft GR developed**
- **Draft GR circulated to funders and comments solicited**
- **Comments considered and resolved (including 30-day ADR process, if invoked)**
- **GR Published**

# Proposed Generic Requirements Process Overview





# **GRPA**

## ***Some Key Changes Introduced in Issue 2 (May 1997)***

- **Information on industry interest in a GR project, and progress in attracting funders will be provided to those requesting it**
- **Small business discount for funders with gross annual revenues that do not exceed \$40M**
- **On large projects (\$50K or more/funder), funders will have a window in which they can opt to not continue funding**
- **Reciprocal Indemnification and liability provision for Bellcore and the funder**

# **GRPA**

## ***Some Key Changes Introduced in Issue 2 - cont'd***

- **Funders may copy draft and final GRs for internal use of funder and majority affiliates.**
- **Funders may incorporate GRs in their product specifications and related documentation (retaining proprietary and copyright legends)**
- **Bellcore and funders agree to Reexport Obligations (Export Administration Regulations administered by Dept of Commerce)**
- **Procedures changes: quorum (51%), minutes distributed within 3 weeks, each member paying the specified fee shall have one vote**

# ***Bellcore Generic Requirements***

## ***Evolving to Meet New Client Needs***

- **Bellcore GR Process Opened to Comply with TA96**
  - **Bellcore Digest Begins Announcing GR Work, and Providing an “Invitation to Fund and Participate”**
  - **The Digest Begins Appearing on the WWW with Twice-monthly updates**
- **August 1996 Supplement to Bellcore Digest Announces approximately 150 Potential 1997 GR Topics**
- **Bellcore Sponsored Workshops and Industry Meetings Describe Open GR Process, and Planned/Potential GR Work Areas**
  - **e.g. ATM, Interconnection, Reliability and Quality Management System, ISDN, Digital Subscriber Line**
- **In 1996 Non-RBOC Clients Begin Agreeing to Fund GR Development; e.g. Year 2000 GR (GTE, Nortel plus 4 RBOCs)**

# ***Bellcore Generic Requirements***

## ***Evolving to Meet New Client Needs (Cont'd)***

- **Non-RBOC Companies Have Decided to Fund or Are in the Process of Considering Funding Many Announced 1997 GR Programs**
- **The Generic Requirements Participation Agreement (GRPA) between Bellcore and Individual GR Clients Has Been Changed for Upcoming Work to Reflect the Comments and Ideas of Clients and Potential Clients as to How to Better Meet their Needs, e.g. more information on other funders, more information on early work, more flexibility in signing-up or dropping out, discounts for small companies**

### **Summary:**

**The Bellcore GR Process is Open**

**New Clients Have Funded or are in the Process of Funding GR Developments**

**The Continuing Ability of Bellcore to Develop GRs Depends upon having the Flexibility to Evolve the Business Aspects of the GR Process to Meet the Needs of those Interested in Funding GR Development**